



# VISA PROBLEMS FOR AFRICAN VISITORS TO THE UK

A joint All-Party Parliamentary Group Report by the APPG for Africa, the APPG for Diaspora, Development & Migration and the APPG for Malawi



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Promotional image of In Search of Dinosaur by Faustin Linyekula / Studios Kabako, presented at The Place during UFTI 2018. Photographer: Agathe Poupeney

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Thank you to those that submitted evidence to the investigation- there are too many to list here! (Please see online Appendix<sup>1</sup>) And to all those that attended the initial hearing in January and shared their experiences of the UK visit visa system.

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<sup>1</sup> Online Appendix for Report- <http://bit.ly/APPGvisas> (June 2019)



# Foreword

The difficulties faced by many Africans wishing to visit Britain in obtaining a visa has been a growing problem for a number of years. It has been raised with many MPs directly, including many of the members of our three APPGs. We therefore wished to find out the true scale and nature of the problem so that something can be done about it. This report is the result of our investigation, though we should emphasise that evidence continues to pour in of the problems we highlight and will be included in the online Appendix<sup>2</sup>. Annex 2 found in the Appendix also provides some informal guidelines and advice to follow when applying for visit visas<sup>3</sup>.

The evidence we received has been clear and consistent. We concluded that not only are the problems real, persistent and pervasive, but they are quite easily remediable; and that unless they are remedied, the damage to Britain's own interests will continue to grow. Visas remain one of the major factors affecting – for the worse – the UK's relations with many African countries. As we approach a fundamental change in Britain's place in the world, we must act fast to resolve the problems that are identified in the report and make access to visas for African visitors smoother, more consistent and more reliable if we are to be able to make Britain the global player that we aspire to and build equal and mutually beneficial relations with our African partners.

We would like to extend thanks to all those who contributed evidence, to those who sifted it and prepared the report for the APPGs, and to all the MPs who have played an active part in the inquiry.



Handwritten signature of Chi Onwurah in black ink.

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<sup>2</sup> Online Appendix for Report- <http://bit.ly/APPGvisas> (June 2019)

<sup>3</sup> Annex 2- RAS Independent Visa Advice, June 2019 (See online Appendix)

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# Executive Summary

Our coalition of APPGs has been concerned for some time with the question of the high level of visa refusals for African nationals seeking to visit the UK, for professional or business reasons. Home Office data on visa refusals shows that African applicants are over twice as likely to be refused a UK visa than applicants from any other part of the world. The UK has good relations with most African countries, but it needs to be recognised that no single issue does more potential damage to the image or influence of the UK in Africa than this visa question. The fact that refusals for applicants from Africa in 2018 were running at more than *double* the global average suggests that something is amiss<sup>4</sup>. The situation needs to be addressed.

Our APPGs have therefore undertaken to coordinate the gathering of as much hard evidence on this issue as possible and particularly in cases where visas appear to have been unjustifiably refused, to the detriment not only of the individual concerned but to British national interests. To that end it invited submissions and held a well-attended hearing in January 2019, the outcome of which has been discussed in detail by the Group with the Minister for Immigration. Records of those meetings are appended to the report<sup>5</sup>. The bulk of the evidence presented comes from UK-based organisations from the private, public and third sectors who have invited Africans to visit the UK for bona fide activities and events which benefit both parties. We have also received some evidence from African governments about official visits.

Drawing on the evidence presented to them, the APPGs identified six specific challenges faced by Africans in applying for visas to the UK:

1. *Practical and logistical barriers*: The rationalisation of visa services has meant that few decisions are now made in the country of application, and for several African countries visa applications as well as interviews can only be done in a neighbouring country. This imposes significant costs, inconvenience and in some cases hardship on some African applicants. The volume and type of documentation required as well as the process is considered particularly demeaning by visitors, who feel that they are treated differently from visitors from other regions.
2. *Inconsistent and/or careless decision-making*: Evidence was presented of apparently irrational decisions that overlooked some of the information provided with a visa application, divergent decisions taken in effectively identical cases, and different decisions taken when an identical re-application was made, all of which reduces trust in the process and increases frustration.
3. *Perceived lack of procedural fairness*: In many cases additional documentation and evidence is requested over and above that specified in the guidelines. The

<sup>4</sup> September 2018 Home Office quarterly statistics show that while 12% of all visit visa applications made between September 2016 and September 2018 were refused, the refusal rate for African visitors was over double this, at 27% of applications. For the Middle East the figure was 11%. For Asia it was also 11%. For North America it was 4%. Home Office, 'Immigration Statistics: Year Ending September 2018—Data Tables', 29 November 2018 (see in particular Entry Clearance Visas Granted Outside the UK Data Tables: Year Ending September 2018—Volume 1 (Table 2))

<sup>5</sup> Online Appendix for Report— <http://bit.ly/APPGvisas> (June 2019)

guidelines need to be amended if these are a requirement, as already pointed out by the Independent Chief Inspector of Immigration.<sup>6</sup>

4. *Financial discrimination in decision-making:* Many applications are rejected because the applicant has little money, even though all costs have been guaranteed by a sponsoring third party. This has on many occasions prevented churches, NGOs, charities, development agencies and academic institutions as well as cultural festivals bringing people to the UK to take part in specific events. This effectively amounts to discrimination on grounds of income.
5. *Perceived gender or racial bias:* The reasons given for rejection in some cases appear to reflect a different standard applied to women applicants compared with men, with additional and sometimes discriminatory evidence seemingly requested. Other applicants also perceived racial discrimination in some of the assumptions underlying reasons for rejection. These give an impression that the 'hostile environment' is extended into Africa.
6. *Lack of accountability or a right of appeal:* The lack of a right of appeal for visitor visas and the apparent absence of oversight are seen to undermine the fairness of the system, allowing prejudiced or inadequate decisions to pass un-contested and uncorrected. The apparent randomness of the granting or rejection of visa applications leads many applicants to believe there may be undisclosed quotas for rejection or for the numbers of visas granted in a fixed period.

Overall, the impact of these challenges is to discourage many Africans with entirely valid reasons for visiting the UK, e.g. to do business, spend money, perform or take part in cultural and academic exchange, to choose not to do so, preferring to visit other countries instead. This we deem not to be in the UK's interests.

Every section of civic and associational life in the UK benefits in some way from the close and historic links the UK enjoys with Africa. In business, culture, science, health, education, academia and in countless other areas, people of the UK are actively engaging with the people of Africa, for mutual benefit. These very positive interactions are inherently reciprocal and, while there have been great technological advances in remote communications, there is no substitution for two-way visits and face-to-face, people-to-people, human interactions. Through each such visit we build mutual understanding and deepen our bonds of cooperation and solidarity.

We recognise that a system of visas is necessary: there are some applicants with illegitimate reasons to visit, or who deliberately intend to overstay. We are also aware that the visa process works under significant resource constraints. But the current level of dissatisfaction with the way the system works for African applicants, and for UK organisations inviting African visitors, needs to be addressed in order to protect the UK's own national interests in developing good relations and exchanges with African countries.

Based on the evidence received, the APPGs recommend a number of specific improvements, set out in the final section. These are summarised briefly below, in the order in which we believe they will have the greatest impact and indicating the relative cost of the measures.

<sup>6</sup> Independent Chief Inspector for Borders and Immigration, Entry Clearance Decision Making: A Global Review, June 2011

**The key recommendations are:**

To improve the application process:

1. Expedited application processes for those applicants who currently have to travel to a neighbouring country to apply and/or be interviewed for a visa (low cost).
2. Clearer information to visa applicants on visa application processes and requirements, especially in terms of supporting documents that must be submitted by the applicant (low cost).
3. Where decision-making is fully digitized, ensure documents are scanned in the country of application (medium cost).
4. More VACs in countries where they are not currently sited (higher cost).

**To improve decision-making:**

5. Greater quality control of rejection letters before they are issued. In particular to ensure the supporting evidence has been fully taken into account and that the guidelines for clearance officers are changed so that the reasons for refusal cannot be based on prejudicial or biased assumptions (medium/low cost).
6. Where there is clear and compelling evidence that a visit is fully-funded by a credible UK-based sponsor, either remove the requirement for the applicant to submit bank statements and prove affluence, or else publish the evidence-base establishing the causal link between poverty and overstays (cost neutral).
7. High Commissions and Embassies should be allowed greater input to the decision-making processes as a matter of course. Streamlined processes should be explored to speed up and simplify the process for VIPs (low cost).
8. A reinforced Inspectorate, and monitoring of the implementation of the Inspector's recommendations, together with a more systematic relationship between the Chief Inspector and the House of Commons Home Affairs Select Committee (medium cost).

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# Introduction

This report is the result of a joint investigation by the APPG for Africa, the APPG for Diaspora, Development and Migration and the APPG for Malawi. We began work in December 2018 and continue to gather evidence. So whilst we are publishing the investigation's findings so far in this report, there is a considerable body of evidence that is still growing, and which can be accessed in full via the online Appendix<sup>7</sup> accompanying this report. The case studies included in this report represent only a sample of the information we have received both formally and informally that can be found in the archive.

Our inquiry began with a public call for written evidence in December 2018 to which we received 25 submissions initially followed by an oral hearing in Parliament in January 2019 attended by over 40 different organisations from across sectors and industry. We have gathered further information and evidence via written and oral parliamentary questions, written correspondence with the Immigration Minister and Secretary of State of the Foreign and Commonwealth Office and via Freedom of Information Requests. We have also held roundtable meetings with the Immigration Minister and Head of UKVI Visa Operations, the Independent Chief Inspector for Borders and Immigration and the FCO Africa Director and other informal bilateral meetings.

This report begins by briefly setting out in Section 1 the UK's approach to Migration Policy and management, along with the historical context and acknowledgment of the constraints faced by policy makers. Section 2 of the report describes the UKVI 'hub and spoke' network for visa applications, examining the implications of network consolidation and highlighting common issues identified by stakeholders relating to the application process. Section 3 sets out the key issues arising from the UKVI entry clearance decision-making process supported by a number of case studies. Section 4 looks at the impact visa refusals have on key sectors in the UK. Finally, Section 5 draws some general conclusions from the investigation and makes recommendations for changes in policy and approach to improve the service offered by UKVI and avoid the problems that have arisen.

<sup>7</sup> Online Appendix for Report- <http://bit.ly/APPGvisas> (June 2019)

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Home Office data on visa refusals shows that African applicants are over twice as likely to be refused a UK visa than applicants from any other part of the world. The UK has good relations with most African countries, but it needs to be recognised that no single issue does more potential damage to the image or influence of the UK in Africa than this visa question.

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## SECTION 1

# UK Migration Policy as set out by Government, and awareness of constraints

The UK maintains a mixed system of managed migration which includes migration from other EU states as well as a points-based system for migrants coming from outside the European Union.

It is important to distinguish between these two categories, as EU nationals who come to the UK to visit, reside, study, or work are exercising their common rights under EU Freedom of Movement. In discussions on immigration to the UK, this group of visitors is all too often conflated with visitors to the UK coming from outside the EU.

The focus of this briefing paper is on visitors to the UK from outside the EU, specifically from African countries.

Migration controls apply to all visitors to the UK from abroad, with the exception of Ireland, the Isle of Man, and the Channel Islands, which form part of the Common Travel Area (CTA) with the UK. Visa controls apply to all visitors to the UK from outside of the EU, for any duration of stay or reason for visiting, although different visas are available for different types of travel (e.g. tourism, study, business).

### **1.1 Historical overview of migration policy in the UK**

As with most other European nation states, migration policy and border controls arose in the UK in the early 20<sup>th</sup> century, a process that was intensified in the UK by security concerns about foreign nationals during WWI. Passports were not widely issued and used before this time.

As noted above, the Common Travel Area was established in the UK, Ireland, the Isle of Man, and the Channel Islands in 1923, which extended a right to reside in the UK for nationals of these territories.

The most significant shift in UK migration policy was arguably the introduction of the British Nationality Act in 1948. This gave all British subjects in the then British Empire (and subsequently Commonwealth) the right to travel to and work in the UK at a time when the country was suffering severe labour shortages post-WWII.

This legislation was subsequently amended several times in the latter half of the 20<sup>th</sup> century, and new legislation introduced, to make it more restrictive in response

to popular concerns about mass migration among the public. Commonwealth immigration, made up largely of economic migrants, rose from 3,000 per year in 1953 to 46,800 in 1956 and 136,400 in 1961.<sup>8</sup> In response to public concerns about migration, a Cabinet committee was established in June 1950 to find “ways which might be adopted to check the immigration into this country of coloured people from British colonial territories”<sup>9</sup>. As a result of these legal changes, Commonwealth citizens lost the right to travel to the UK without having first secured work in the country, and also lost the automatic right of registration as British nationals, instead being required to undergo naturalisation procedures in line with the nationals of other countries.

Immigration rules introduced under the Immigration Act 1971 were updated in 2012<sup>10</sup> to create a strict minimum income threshold for non-EU spouses and children to be given leave to remain in the UK. These rules were subject to legal challenge, and the Supreme Court found in 2017<sup>11</sup> that, while “the minimum income threshold is accepted in principle”, the rules and guidance were defective and unlawful until amended to give more weight to the interests of the children involved, and that sources of funding other than the British spouse’s income should be considered.<sup>12</sup>

The British Nationality Act 1948 was subsequently replaced by the British Nationality Act 1981, which has been significantly amended several times, including by the:

- British Nationality (Falkland Islands) Act 1983
- Hong Kong Act 1985 and Hong Kong (British Nationality) Order 1986
- British Nationality (Hong Kong) Act 1990, which introduced the British Nationality Selection Scheme
- Hong Kong (War Wives and Widows) Act 1996
- British Nationality (Hong Kong) Act 1997
- Adoption (Intercountry Aspects) Act 1999
- British Overseas Territories Act 2002
- Nationality, Immigration and Asylum Act 2002
- Immigration, Asylum and Nationality Act 2006
- Borders, Citizenship and Immigration Act 2009

The UK government introduced the Immigration Act in 2014, which makes provisions to prevent private landlords from renting houses to people without legal status, to prevent illegal immigrants from obtaining driving licenses and bank accounts, and for the investigation of sham marriages, and introduced what was at the time described as a ‘hostile environment’ policy to deter illegal migrants from coming to, or staying in, the UK. This was updated in 2016, one result of which was to place duties on a range of individuals and organisations – ranging from banks, landlords, and public services – to require proof of migration status from migrants, and where this was lacking to share information about such individuals with the Home Office.

Although not a legal requirement of UK migration policy, from 2010 the UK government sought to introduce explicit caps on migration flows to the UK as part of its manifesto commitments, seeking to restrict inward net migration to the UK from outside the EU to 100,000 people per annum or lower. This policy, which still proves controversial, has never met this target. There is widespread concern that it is an unrealistic target that has led to over-assertive efforts on behalf of UKBA to remove migrants or people of migrant origin, even in cases of, as the recent Windrush scandal has shown, British

<sup>8</sup> HC Deb 19 March 2003 vol 401 cc270-94WH

<sup>9</sup> Ibid.

<sup>10</sup> Annex I- Overview of International Migration Context (See online Appendix)

<sup>11</sup> MM (Lebanon) v Secretary of State for the Home Department [2017] UKSC available here - <https://www.supremecourt.uk/cases/uksc-2015-0011.html> (Last accessed June 2019)

<sup>12</sup> The impact on children of the Family Migration Rules (PDF), Children’s Commissioner for England, August 2015

Commonwealth citizens who are entitled to British citizenship or who have indefinite leave to remain in the UK. Whether similar pressures have in any way influenced UKVI decision-making with regard to visa applications from outside the EU remains to be seen, but this is an important area for further inquiry.

## **1.2 Migration Management in the UK**

In common with most modern states, UK migration policy seeks to achieve effective management of migration stocks and flows to and from the UK. This is important to keep track of who is coming into and out of the country – although it should be noted the UK still does not record departures, only arrivals, in contrast to other EU states such as Germany. More specifically, as EU citizens coming to the UK are not merely foreign nationals but EU citizens exercising their treaty rights, ‘managed migration’ refers in the UK to management of all legal migration flows and stocks from outside of the EU, including short-term visitors, migrant labour, or students from abroad.

Such a migration management approach is needed to balance border security and integrity with the needs of a UK economy where a number of sectors rely heavily on labour migration to sustain growth. Indeed, from 2002 to 2008, the UK introduced the Highly Skilled Migrant Programme to help fill labour shortages in certain professions; this permitted access to UK labour markets even where the individual had not already secured employment in the UK.

The UK established the Migration Advisory Committee (MAC) in 2007 to provide policy advice on migration.

In 2008, the UK replaced the Highly Skilled Migrant Programme with a points-based system composed of five tiers:

- Tier 1 – for highly skilled individuals, who can contribute to growth and productivity;
- Tier 2 – for skilled workers with a job offer, to fill gaps in the United Kingdom workforce;
- Tier 3 – for limited numbers of low-skilled workers needed to fill temporary labour shortages; (which has never been implemented)
- Tier 4 – for students;
- Tier 5 – for temporary workers and young people covered by the Youth Mobility Scheme, who are allowed to work in the United Kingdom for a limited time to satisfy primarily non-economic objectives

This report focuses, however, on the issue of short-term visitors’ visas, as this is where the most immediate problems have been identified. For *all* types of UK visa applications, immigration officers have to be satisfied about a person’s nationality, identity, and reasons for coming to the UK, and entry can be refused if they are not satisfied.

## **1.3 Constraints on UK Migration Policy**

The government continues to face significant constraints on developing and implementing migration policy in the UK. These include the following:

- **Resources and other practical factors:** Management of migration requires resources, both in systems and processes and human capital. UKVI, the government agency ‘at the sharp end’ of managing migration to the UK has had limited financial resources while dealing with an increased workload, as the numbers of visitors to the UK have also increased.
- **Legal factors:** national and international legal frameworks and agreements place obligations on the UK government in terms of how it treats migrants and refugees in law. This in turn places limits on migration policy and its implementation.
- **Economic factors:** The UK economy has relied on migrant labour to fill skills shortages in a range of different sectors, and immigration has been one of the drivers of UK economic growth over the last 30 years. The UK will continue to need migrant labour for years to come, even with greater efforts to upskill British workers.
- **Political factors:** the debate on migration in the UK is highly politically charged. Whilst the public are aware of the positive economic, social, and cultural contributions that migrants make to the UK, and public concern about migration has decreased since 2016, migration remains a contentious issue. Popular concerns about levels of migration have been linked – unfairly in most cases – to increasing pressure on public services; availability of employment, especially sustainable jobs with reasonable rates of pay; concerns about security and terrorism; and concerns about the integration and/or assimilation of migrants.

There is a strong case for reforming UK migration management policy and practice, not least because it lacks coherency and consistency due to its particular historical development. At a time when the UK is seeking to build new trade and economic links with the world, this will require an immigration system and visa regime that will support this.

As the UK prepares to leave the European Union, the government has proposed harmonising the migration rules applied to EU nationals with those applied to visitors from outside the UK as part of a unified immigration system. This has been promoted by the government as a fairer approach to migration management, although it has been criticised for ‘rounding down’ migrant rights, rather than improving the rights of migrants overall in a consistent way. In the case of EU nationals coming to the UK to visit, it is likely that a visa waiver scheme will be introduced (and for UK nationals visiting the EU) that would enable visitors to visit (but not work) for up to 90 days. However, this is dependent on the progress of Brexit negotiations.

<sup>13</sup> ‘The UK’s future skills-based immigration system’ (White Paper, Dec 2018) – available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/766465/The-UKs-future-skills-based-immigration-system-print-ready.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/766465/The-UKs-future-skills-based-immigration-system-print-ready.pdf)

The UK is in the process of developing a new migration policy post-Brexit that will need to balance the need for migration at a range of skills levels, the capacity of local areas to receive migrants, and the requests for improved visa access for nationals of countries with which the UK seeks to sign trade and other agreements. Visitor visas for Africans, as for all nationalities, should form part of this wider policy review, for which the recommendations in this report need to be taken into account.<sup>13</sup>

## SECTION 2

# UKVI “hub and spoke” model and application challenges

Since March 2007, the UK Government has gradually rolled out the “hub and spoke” structure for the visa delivery system whereby applications to visit the UK are made at Visa Application Centres (VACs), which act as the spokes, and the decisions on those applications made at Decision Making Centres (DMCs), which are the hubs<sup>14</sup>. As the reform was rolled out, the Government closed almost all visa sections based in British High Commissions or Embassies to concentrate decision making in larger hubs. This change was justified on the grounds that it enabled the then UK Border Agency (re-launched by the Home Office in March 2013 as the UK Visas and Immigration Service, UKVI) to improve the efficiency and consistency of entry clearance decision making, while reducing overall costs.<sup>15</sup>

### 2.1 Impacts of network consolidation in Africa

Detailed information on the workings of the current hub and spoke model in use in Africa is not readily available online. However, the Office of the Immigration Minister at the Home Office did release up to date information in May 2019 on written request from the inquiry Chairs.<sup>16</sup> This indicates that from 2019 there will be only two Decision Making Centres for the whole of Africa: one in Pretoria serving Visa Application Centres in the African Horn and Southern, Central and Eastern Africa, and one in Croydon which would deal with all decision making for West African VACs. This would imply that over the past two years the Government has either closed or scaled-down operations in DMCs reported in Accra and Abuja in 2017<sup>17</sup> which are not found on the 2019 list.<sup>18</sup> Nevertheless, a Home Office official (the Head of UKVI Visa Operations) told the inquiry there are still small decision-making teams in Lagos and Abuja in Nigeria and in Accra, Ghana and one member of visa staff in Nairobi, Kenya, and it is not clear to the inquiry whether these will remain or disappear.<sup>19</sup>

This is consistent with the process of network consolidation, through which the Home Office is “onshoring” more decision making back to the UK DMCs. The consequence, however, is that entry clearance decisions for African applicants are often made at DMCs hundreds or thousands of miles from the place of application and, significantly, far away from local expertise, context and insight that could previously be provided by the local High Commissions or Embassies, which are now bypassed and excluded from the process.

The Independent Chief Inspector for Borders and Immigration (ICIBI) report of July

<sup>14</sup> House of Commons, ‘Written Question: Immigration: Hub and Spoke System’, HC Hansard, 8 February 2010, col 746W

<sup>15</sup> House of Commons, ‘Written Question: Belarus’, HC Hansard, 28 January 2014, col 470W

<sup>16</sup> The Rt. Hon. Caroline Nokes MP, Letter to Chi Onwurah MP, 19th May 2019 (See online Appendix)

<sup>17</sup> UKVI, Response to Freedom of Information Request from N. Ostrand (FOI Ref: 44306) 3rd July 2017. Source: [https://www.whatdotheyknow.com/request/412644/response/1000172/attach/3/FOI%20Response%2044306.pdf?cookie\\_passthrough=1](https://www.whatdotheyknow.com/request/412644/response/1000172/attach/3/FOI%20Response%2044306.pdf?cookie_passthrough=1) (last accessed June 2019)

<sup>18</sup> UKVI, Response to Freedom of Information Request from Hetty Bailey (FOI ref: 53632), 21st May 2019 (See online Appendix)

<sup>19</sup> Hope-Jones, D & Bailey, H, Short minutes of APPG Africa meeting with Rt. Hon. Caroline Nokes MP, 13th February 2019 (See online Appendix)

2017<sup>20</sup> commented that “*Inevitably, this means fewer UKVI staff have first-hand experience of the countries from which applications are received, and there is a risk that this loss of local knowledge will impact adversely on decision quality.*” When the inquiry committee met with the current ICIBI, David Bolt, he reiterated his concern that a lack of local knowledge may be having an adverse impact on decision making quality. The onshoring policy as a whole is the subject of an ongoing ICIBI inspection.

Since 2007, many visa-granting facilities at UK missions have been closed across Africa. Though most countries are now covered by one or more VACs, the following 24 countries still have no VAC, so applicants have to visit a neighbouring country to apply for a visa: Benin, Burkina Faso, Burundi, Cape Verde, Central African Republic, Chad, Congo Brazzaville, Comoros, Djibouti, Equatorial Guinea, Eritrea, Eswatini, Gabon, Guinea, Guinea Bissau, Lesotho, Liberia, Libya, Mali, Mauritania, Niger, Sao Tome and Principe, Somalia and Togo; and the following countries have only a part-time VAC (i.e. not open all working days) which can slow down the process: Ivory Coast (twice a week) and Madagascar (twice a month).<sup>21</sup>

In 2014, a £621 million contract<sup>22</sup> for the running of UKVI Visa Applications Centres and Decision-Making Centres was granted to Teleperformance UK Ltd for an initial five-year period. This was extended recently for two years until 31<sup>st</sup> March 2021 with an option to extend again until 2023 with tendering to begin in 2019.<sup>23</sup> The Head of UKVI Visa Operations told the inquiry using a private company had resulted in better decision making quality and customer service and delivers better value for money to tax payers.<sup>24</sup> David Bolt, the ICIBI, told the inquiry, he had not seen evidence to show that ‘customer service’ and ‘value for money’ had improved. He had yet to examine the Home Office contract with Teleperformance UK Ltd, and feared that the Home Office might be reluctant to share it with him because of commercial and legal concerns, despite it falling within the ICIBI’s statutory remit. The evidence gathered by the inquiry also indicated clearly that it is *not* the perception of the customers that either service levels or decision making have improved.

Earlier in 2019, we understand the Pretoria DMC moved to a system of digital assessment, through which documents are scanned by the commercial partner, in this case Teleperformance UK Ltd, and DMCs make decisions based on the electronic files rather than seeing the actual documents. This process of digitisation seems to be an integral part of the move to network consolidation and has the *potential* to improve customer service given applicants need not necessarily be separated from their personal documents. However, we understand that in Malawi and, we presume, many other countries in Africa, this is not the case. We are informed that applicants visit the VAC, submit their personal documents (passports, birth certificates, marriage certificates, bank statements, wage slips, official letters, etc), and all these documents are still couriered to Pretoria where they are scanned in by the same commercial company that posted them from Lilongwe. Teleperformance UK Ltd then transfer the digital files to the DMC, also in Pretoria, and await a decision before sending back the physical documents. We are told informally by UKVI officials that this most surprising approach to digitisation is the chosen model of the commercial partner rather than being intended or prescribed by UKVI.

Moving to a digital system in which applicants’ essential personal documents are still posted across the continent, just to be scanned in by the same company that sent

<sup>20</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

<sup>21</sup> Source: <https://www.gov.uk/find-a-visa-application-centre> (last accessed 20th June 2019)

<sup>22</sup> <https://data.gov.uk/data/contracts-finder-archive/contract/1394970/> (last accessed 7th May 2019)

<sup>23</sup> House of Commons, ‘Written Question: Visas: Africa’, 11 September 2018, 169468

<sup>24</sup> Hope-Jones, D & Bailey, H, Short minutes of APPG Africa meeting with Rt. Hon. Caroline Nokes MP, 13th February 2019 (See online Appendix)

them, seems to show worryingly little regard for customer experience. It significantly increases the cost, time and inconvenience of application, not least because applicants cannot either travel internationally or apply for any other visas while their UK visa application is being processed.

It is hard to imagine that this hub and spoke approach to digitizing documents would lead to either decreased costs for HMG or increased quality of decision making. Even if the commercial staff in Pretoria are trained to a higher level than their staff in the VACs, it is unlikely they would be better able to identify fraudulent documents, given they are scanning documents from a large number of different countries. In contrast, VAC staff, who most typically are nationals from within that country, are well placed to identify false documents at the point of digitization given, for example, this would be a Malawian national scanning only Malawian passports and birth certificates.

## 2.2 Practical, logistical and financial barriers

As of 2019, there are just two Decision Making Centres (DMCs) and 32 Visa Application Centres (VACs)<sup>23</sup> serving a continent of 1.3 billion people across 57 countries covering a land mass of 11.5 million square miles. Therefore, it is no surprise that an African national seeking to apply for a UK Visit Visa faces significant practical and logistical barriers. These can be broadly grouped into four obstacles:

- a. **Cost:** The price of a standard visitor visa itself – currently £95 for 6 months – is significant<sup>26</sup>. This must be paid for online in a foreign currency and is non-refundable if the application is unsuccessful. The immediate cost and risk of losing that money and the necessity to access the internet all present early barriers for many hopeful applicants. According to immigration Solicitor Iain Halliday information via the telephone helpline is vague and expensive<sup>27</sup> and UKVI levies a charge of £1.37 per minute for telephone calls and a £5.48 email charge for overseas applicants.<sup>28</sup> Crucially, it is not possible to speak to the case worker who is actually dealing with the application; only to call centre staff with limited information and knowledge.
- b. **Documentation:** after completing the online application, applicants are required to attend an appointment in person at a VAC to provide biometric data and original documents. The requirement to produce official marriage and birth certificates and bank statements can present difficulties in countries where such documentation is not always easily or cheaply available from national authorities.
- c. **Travel and access:** attending the nearest VAC in order to deposit the application together with the biometric data often necessitates costly and time-consuming long-distance travel over hundreds of miles across country or across borders. Further, some accounts suggest that UKVI is not ensuring safe access to their VACs in some parts of Africa and the ICIBI had heard accounts of applicants being charged by non-UKVI employed staff to enter VAC buildings.
- d. **Time consumption:** decisions themselves can also be subject to long delays, including waiting for an initial appointment, and the process can take weeks

<sup>25</sup> The Rt. Hon. Caroline Nokes MP, Minister of State for Immigration, Letter to Chi Onwurah MP 4th June 2019 (See online Appendix)

<sup>26</sup> [www.gov.uk/government/publications/visa-regulations-revised-table/home-office-immigration-and-nationality-fees-29-march-2019](https://www.gov.uk/government/publications/visa-regulations-revised-table/home-office-immigration-and-nationality-fees-29-march-2019) Last accessed June 2019

<sup>27</sup> Iain Halliday of McGill & Co Solicitors, Written Evidence to APPG, January 2019 (See online Appendix)

<sup>28</sup> HL Hansard, 18 October 2018, col 564

adding to the expense of applying if one has had to travel to a distant city or neighbouring country. The passport of the applicant is held for the duration of the application whilst documents are couriered across the continent, often just to be scanned in by the same commercial partner that sent them. Whilst they wait, the applicant is generally unable to find out any information on the status of their application as online tracking of applications has not been made available for short-term visit visas.

In short, for many African applicants, the process is arduous, time-consuming and expensive. This alone puts off not only casual or criminal applicants, but many who have legitimate and beneficial reasons for visiting the UK.

### **Case Study: Applying for a Visa from Mauritania**

The written submission from the Embassy of the Islamic Republic of Mauritania highlighted the fact that all UK visa applications from Mauritania, including those with diplomatic passports, are required to travel to the VAC in Rabat. For some in Mauritania, this is a round-journey of over 4,000km to visit a VAC. Significantly, it also means that to start an application for a UK visa, Mauritanian citizens have to first secure a Moroccan visa, just to visit a VAC. The Mauritanian Embassy has said this is causing friction between Mauritania and Morocco, as Mauritanian Ministers are reliant on a Moroccan ruling to accept an invitation to the UK from the UK Government.<sup>27</sup>

Liberian officials have also complained informally of the need to travel to Accra in Ghana to apply for visas; and officials from the Ivory Coast say that, while there is now a VAC operating in Abidjan two days a week, which avoids the need to travel to Accra, this can still mean inconvenience and delay in submitting visa applications.

<sup>27</sup> Embassy of the Islamic Republic of Mauritania, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

## SECTION 3

# UKVI entry clearance decision making

Once the application arrives with an Entry Clearance Officer (ECO) at a DMC, the application then has to satisfy five legal requirements in the immigration rules to secure a UK visit visa. First, that the applicant intends to leave the UK at the end of their visit (a subjective test known as the 'genuine visitor test'). Second, that they will not be effectively living in the UK through frequent or extended visits. Third, that they are genuinely seeking entry for a purpose permitted by the visit visa rules. Fourth, they are not carrying out any prohibited activities, such as work or study. And fifth, that they have sufficient money to pay for the trip. The inquiry Chairs believe that it is not the rules in themselves which are problematic but it is the application of these legal requirements which is inconsistent and affects decision quality.

### 3.1 Inconsistent or unfair decision making

Under the first criteria, on which many applications fail<sup>30</sup>, applicants must convince the ECO that they are a 'genuine visitor'. The Home Office guidance on the 'genuine visitor test' allows the political, economic and security situation of the country of application, or even just the nationality, to be considered.<sup>31</sup> It also allows statistics on immigration compliance from those in the same geographical region to be considered. This appears to allow prejudice and unjustified assumptions to come into play when deciding whether an application is genuine<sup>32</sup>. The inquiry received numerous cases demonstrating that even small, insignificant discrepancies in the documentary evidence are used to draw the conclusion that the applicant is not 'genuine'.

Immigration lawyer, Iain Halliday explained that there appears to be a presumption that the visitor will abscond, and that proof of previous visits and return to the country of origin is often not given appropriate weight. The impression gained by many African applicants from their own experience is that Home Office officials seem to assume that they will not leave the UK at the end of their visit and that therefore the decision making scales are automatically weighted in favour of a visa refusal.<sup>33</sup> Further, according to the ICIBI *"Since 2015, UKVI has been developing and rolling out a 'streaming tool' that assesses the perceived risks attached to an application. The streaming tool is regularly updated with data of known immigration abuses... It streams applications 'Green' (low risk), 'Amber' (medium risk) or 'Red' (high risk). There is a risk that the streaming tool becomes a de facto decision-making tool."*<sup>34</sup> The ICIBI told the inquiry he was concerned that overreliance on the algorithmic "streaming" tool could mean that decisions were not being made on the merits of the individual case but on a set of generalised and detached indicators.

Evidence submitted to the APPG inquiry showed frequent errors in the handling of

<sup>30</sup> Iain Halliday of McGill & Co Solicitors, Written Evidence to APPG, January 2019 (See online Appendix)

<sup>31</sup> See page 16 of guidance here - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/793361/Visit-guidance-v8.0ext.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/793361/Visit-guidance-v8.0ext.pdf) (Last accessed June 2019)

<sup>32</sup> Iain Halliday of McGill & Co Solicitors, Written Evidence to APPG, January 2019 (See online Appendix)

<sup>33</sup> Iain Halliday of McGill & Co Solicitors, Written Evidence to APPG, January 2019 (See online Appendix)

<sup>34</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

applications and inconsistent decision making, depending on the individual decision maker. While a margin of human error is accepted in most contexts, the rate of mistakes and inconsistency suggests a systemic failure whereby clearly inaccurate decisions can be made with no quality assurance or fact-checking. The last global review of entry clearance decision making was in 2011 and found poor quality decision making in 35% of cases.<sup>35</sup> Subsequent inspections of the ICBI have repeatedly raised concerns relating to decision making quality and there is little to suggest improvement.

### Case Study: Inconsistent decision making

Case studies from CAFOD and London International Festival for Theatre, reported numerous examples where applications were initially refused but were accepted on a second application, in spite of the fact that no changes had been made on resubmission.<sup>36</sup>

Further, Public Administration International, showed evidence that when almost identical applications were made by African officials to come on the same training course in London, more junior staff were granted visas while more senior staff were refused, even though there was no clear difference in their circumstances or applications.

Councillor Kate Anolue, Deputy Mayor of the London Borough of Enfield, gave oral evidence to the APPG highlighting her experience of applying for UK visas for her family in Nigeria. Councillor Anolue said she considers herself to be a good UK citizen having been in the country for over 40 years, working as a midwife and ultimately becoming Mayor of Enfield. She outlined multiple instances where she has applied for close family members to visit her in the UK and visas have been rejected. In some instances, applications are granted for several years for an individual (8 years consecutively), only to be refused in a near identical application in the 9th year. Councillor Anolue was able to provide assurances for the funding of flights, accommodation and subsistence, and was frustrated that it is not clear how her only sister could make a successful application to visit her in the UK after 40 years, to attend her 70th birthday and see her second Mayoral appointment.<sup>37</sup>

## 3.2 Erroneous issue and refusal notices

The poor level of accuracy and completeness of the visa issue notes and refusal notices was raised by a number of witnesses and has been a repeated theme in previous inspection reports of the ICBI. This further suggests that due consideration of individual circumstances is not taking place. The 2014 inspection found that 42% of refusal notices were *“not balanced, and failed to show that consideration had been given to both positive and negative evidence.”*<sup>38</sup> Further, the 2017 inspection reported that significant improvements were needed to eliminate factual errors and recommended that the use of generic issue notes should be stopped as they *“fail to reflect the specific circumstances of individual applications and the reasons for decisions”*.

The 2017 inspection sample of Croydon DMC found that of 49 refusal notices, 24 were unsatisfactory due to factual inaccuracy (e.g. citing lack of documentary evidence that was in fact included, or confusion over which country the applicant was from) or inappropriate grounds (e.g. documents being ‘too faint’ when they were clear,

<sup>35</sup> Independent Chief Inspector for Borders and Immigration, Entry Clearance Decision Making: A Global Review, June 2011

<sup>36</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

<sup>37</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

<sup>38</sup> Independent Chief Inspector for Borders and Immigration, An inspection of Family Visitor visa applications, Dec 2014

or having a “limited body of evidence” to demonstrate a subsisting relationship). One family reunion application included marriage certificates and passports for the couple’s four children born over a ten-year period but was still unsuccessful.<sup>39</sup>

### **Case study: Inaccurate or careless mistakes in decision-making**

The Scotland Malawi Partnership highlighted a case where a high-profile musician invited to the UK from Malawi was given a visa rejection letter from UKVI which essentially stated: ‘we reject your visa because [insert reason here]’. The letter had not been completed by UKVI before being sent to the applicant, with the pro forma advice to the visa assessor about what information should be included in the letter still visible to the applicant.<sup>40</sup>

In 2019, the University of Bradford invited a South Sudanese academic/activist for an event. When he applied for a visa in Nairobi, his passport was sent back to him with nothing added. Assuming he had been refused, the event was cancelled, only for him to receive a message a week later saying they had forgotten to put the visa in the passport and asking him to return his passport to have the visa inserted.<sup>41</sup>

Such incidents are acutely embarrassing and inconvenient for all involved.

### **3.3 Assumptions regarding wealth**

Inability to demonstrate that the applicant has sufficient money to pay for the visit is another common reason for rejection. In the evidence received by the inquiry, it was often asserted that this results in systemic prejudice against African applicants. The entry clearance system seems to make little consideration of, or allowances for, the bureaucratic or cultural context of the country the application is from. For example, regular banking is not always readily available, individuals may have multiple jobs or incomes, salary payments may not always follow a strict monthly pattern and in some circumstances families may habitually pool and share resources in a more fluid manner. Insisting therefore that every small transaction is accounted for becomes an impossible burden.

The single most common issue highlighted by those who gave evidence was the requirement to prove the financial circumstances of the applicant, even where the visit is fully funded by a credible UK sponsor. The inquiry heard that many applications were rejected for purely financial reasons (including insufficient/undocumented income, travel expenses judged not commensurate with personal and financial circumstances etc) or because of minor discrepancies for unaccounted small payments. This was regularly the case even when sponsoring agencies and organisations provided proof that costs would be covered. This is a serious problem, particularly for those working for religious organisations, NGO activists and academics, many of whom have low incomes but entirely legitimate reasons to make short-term visits to the UK for pastoral or professional purposes, including for example for conferences or public meetings.<sup>42</sup>

The inquiry has not seen any compelling evidence to justify an approach which views a lack of affluence as, in itself, reasonable grounds for declining a visa application. It is

<sup>39</sup> The Independent Chief Inspector for Borders and Immigration, *An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul*, July 2017

<sup>40</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

<sup>41</sup> University of Bradford, Submission to APPGs, June 2019 (See online Appendix)

<sup>42</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

unclear on what basis financial details are required from the applicant if a visit is fully funded. It is deeply problematic to conflate poverty with presumed criminality without a clear evidence base.

<sup>43</sup> ActionAid, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

<sup>44</sup> CAFOD, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

<sup>45</sup> Bristol University, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

Many applicants, particularly government ministers, officials and VIP visitors, including for example a senior African Union Commissioner on his visit to Westminster parliament in 2018, considered it unreasonable, intrusive and demeaning to be required to provide such a detailed range of personal data. In a number of cases, those giving evidence stated that even if a visa is ultimately granted, the process can be so unpleasant, intrusive and dehumanising, that the purpose of the visit is undermined because of the loss of goodwill before any travel takes place.

These experiences tend to give rise to an impression that the UK wishes only to grant visas to wealthy visitors and that the poor need not apply.

### **Case Study: Too much or too little money**

ActionAid highlighted the challenges it has getting young human rights activists to the UK to speak about their work, often supported by DFID. The most common reason for refusal is income and bank statements. ActionAid highlighted a fundamental 'Catch 22': junior staff do not have sufficient funds in their personal bank accounts to secure a UK visa and so cannot attend training and development opportunities in the UK, as a result of which they remain junior staff.<sup>43</sup>

CAFOD, the Catholic Agency For Overseas Development, observed a steep increase in the number of refusals from Africa in the last seven years. They highlighted one refusal from the DRC where a Priest was denied a visa for not being able to say how much he had in his bank account. Catholic Priests do not earn an income, so it is deeply questionable, and intrusive to have this requirement when CAFOD have clearly stated they are covering all costs.<sup>44</sup>

Further, CAFOD highlighted that they have had visa rejections both because applicants have had insufficient funds in their bank accounts but also because they have had too much. If an applicant has £200 in a bank account but does not explain where these funds have come from this can be cited as grounds for rejection.

This approach is also a serious challenge for professionals undertaking freelance consultancy work. For example, a renowned writer invited to speak at Bristol University was rejected due to small sums for freelance work that despite explaining them in the application were deemed "untraceable". This was felt to be a short step away from accusing the applicant, a leader in their field, of being a fraud.<sup>45</sup>

To cite one specific refusal letter, a distinguished female African scholar invited to attend the ECAS 2019 conference in Edinburgh to present a paper was refused on the grounds quoted below, even though UKVI acknowledged that the sponsors would fund the trip: *"You are self employed Nigeria [sic] and earn 1500000.00 NGN (£3,199.56) a year. Your GT bank statement has a balance of 945,188.13 NGN (£2,016.12) on 2<sup>nd</sup> April 2019. The credits and balances in your account are not consistent with your declared yearly income and I am not satisfied about the origins of the funds in your bank account. On the evidence before me I am not satisfied that this statement is a true reflection of your financial circumstances or that your circumstances are as stated. In the light of*

*the above and on the balance of probabilities, I am not satisfied that you are genuinely seeking entry as a visitor for a limited period not exceeding six months or that you intend to leave the UK at the end of the visit...<sup>46</sup>*

The individual in question had recently travelled to Europe and returned to Nigeria five times without incident. It is hard not to read such a letter as personally insulting.

### 3.4 Seeming discrimination

The grounds on which an application can be rejected are often not clear and can vary enormously, even for a single applicant. This elasticity gives rise to inconsistency, and to decisions that can be considered discriminatory or prejudiced.

When comparing cases where applicants were refused, ASA-UK found that some women were asked personal and inappropriate questions when men were not. For example, women were asked to provide proof of marriage and children, or of owning property, when men are not.<sup>47</sup>

Further, some case studies demonstrated questionable and sometimes offensive reasons for refusals. ASA-UK's data found that in some cases, visa officers misread information in a manner that suggests a failure to grasp significant professional contexts and work, and which suggests racial prejudice. In one instance, a highly regarded full Professor, who had been invited to the conference in recognition of his contribution to ongoing debates, was denied a conference visa because he had not demonstrated that he had 'previously' been sent on similar training in the UK.' The assumption that an African academic would only visit the UK to be 'trained' was both offensive and taken to be prejudice.<sup>48</sup>

In another example, the London International Festival for Theatre had some Tier 5 applicants refused who were an internationally renowned choreographer and two dancers from the DRC presenting a performance reflecting on their personal experience of the civil war. Their visas were refused as the entry clearance officers could not understand why dancers from the UK could not fill these roles.<sup>49</sup>

<sup>46</sup> ECAS Submission to APPG, June 2019 (See online Appendix)

<sup>47</sup> African Studies Association UK, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

<sup>48</sup> African Studies Association UK, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

<sup>49</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

<sup>50</sup> Dr Robtel Pailey, Written Evidence Submission to APPGs, January 2019 (See online Appendix)

#### **Case Study: Cost, inefficiency and discrimination**

*The text used in this case study is quoting verbatim from the original written submission from Dr Pailey to the APPG inquiry. The full text is available in the report's online appendix.*

Dr. Robtel Neajai Pailey is a Liberian national based at the University of Oxford, who has experience of applying for different kinds of UK visas (tourist, Tier 4, Tier 2) both from the US (as a permanent US resident) and Liberia (as a Liberian national) since 2006. She believes that UK immigration processes for African nationals are 'discriminatory and meant to humiliate and strip Africans of their dignity.'<sup>50</sup>

Dr. Pailey's first experience applying from the US for a UK visitor visa in 2006 was relatively smooth although she found that the supporting documents required upfront were intrusive and cumbersome (confirmed travel itinerary, confirmation of accommodation, health insurance,

3-month bank statements, list of countries visited within the past 10 years, with dates, etc), and the cost of UK visa fees were prohibitive, especially as they are non-refundable if rejected.

However, her last experience applying for a Tier 2 visa from Accra, Ghana, was 'the absolute worst'. Not only were the procedures unnecessarily time-consuming, but the costs were 'akin to extortion'. In addition to the visa fees, she had to pay an extra fee for a TB test, even though she had taken a similar test for the same visa application centre a year or two before. She also paid an extra fee for a 'Priority Service', erroneously advertised as a fast-track service, which failed to deliver by the promised date and forced her to reschedule a trip to Southern Africa at considerable personal cost in cancellation fees.

While waiting for her passport, she spent countless hours contacting UK Visas and Immigration (UKVI) via phone and e-mail to ascertain the status of her application (which required upfront additional payment), and response times were unsatisfactory. There was very little communication between the UKVI, the UK High Commission in Ghana and the Visa Application Centre in Accra, and no one could notify her about the whereabouts of her passport even though she asked for her travel document back before a visa decision was made. While she finally received her passport after more than three weeks, she submitted a formal complaint in writing demanding a full refund of the Priority Service fee. Her request was dismissed.

Dr. Pailey believes that her contrasting experience applying from the US and from Africa, having heard similar stories from other African colleagues and friends, demonstrates discrimination against those applying from the continent. She is now convinced that UK immigration processes are deliberately structured to deter and discourage African nationals from applying for and securing visas, the process being 'dehumanising, xenophobic and racist'. She believes this bodes ill for Africa-UK relations after Brexit.

Separately, the African Studies Association UK presented evidence of two forms of discrimination, firstly against women and secondly on grounds of nationality. On the latter at their most recent bi-annual conference in 2018, there were 21 documented cases of visa refusals or delays, 15 of which concerned Nigerians and three Ugandans. This was not representative of the number of applicants attending the conference from these countries and suggested applicants from Nigeria and Uganda were being treated more severely than applicants from other African countries.<sup>51</sup>

### 3.5 Lack of procedural fairness

The inquiry also heard of situations where applications were rejected based on an absence of information not required or suggested under the application guidelines. Evidence was provided of applications being rejected for not having provided birth certificates for all the applicant's children, or because third country documentation was not valid for a long period post travel. The 2011 report of the former ICIBI, John Vine, found that 16% of a global sample of applicants were refused entry clearance for failing to provide information which they could not have been aware of at the time of submitting their applications.<sup>52</sup> As such, he repeatedly recommended in various inspections between 2011-2012, that applicants should be told exactly what evidence is required to be successful. He added that if they have followed guidelines, but the ECO needs more information to decide, applicants should be able to submit this evidence before the application is rejected.<sup>53</sup>

<sup>51</sup> African Studies Association UK, Written Evidence Submission to APPG, January 2019 (See online Appendix)

<sup>52</sup> Independent Chief Inspector for Borders and Immigration, Entry Clearance Decision Making: A Global Review, June 2011

However, despite both these recommendations being accepted by the Home Office,<sup>54</sup> eight years later evidence strongly suggests that neither recommendation has been effectively implemented. There is still no clear guidance of what is needed to be successful – only a list of suggested supporting documents that is not exhaustive and is only available online in either English or Chinese<sup>55</sup>. Furthermore, applicants who followed the guidelines still have no opportunity to submit additional evidence to clarify an issue before a case is rejected.

<sup>53</sup> The Independent Chief Inspector for Borders and Immigration, A Comparative Inspection of the UK Borders Agency visas sections that process applications submitted in Africa: Nairobi, Abuja, Pretoria and the UK Visa Section, July 2011 & Independent Chief Inspector for Borders and Immigration, Entry Clearance Decision Making: A Global Review, June 2011

In the inquiry meeting with the Immigration Minister, the Head of Visa operations at UKVI, explained that UKVI avoided constraining or burdening applicants with an exhaustive list of documentation, and claimed that allowing additional information to be submitted after application would be a huge undertaking for which UKVI did not have the capacity. He added that it is usually faster to pay again and re-apply with the missing information, despite this involving additional expense for applicants who may have been unjustifiably refused<sup>56</sup>. The inquiry found that there was still confusion around what is required for a successful application and that this lack of clarity made the system opaque and unfair while increasing the chances of a rejection.

### Case Study: Inadequate Guidance

ASA-UK reported cases where academics were denied a visa because it was judged that the conference expenses were not commensurate with their financial circumstances, although there is no guidance as to what threshold is used to judge this. If visa officers can reject applications on this basis, it should be stated clearly on UK and local visa websites what percentage of resources/annual income is considered reasonable expenditure for a trip.<sup>57</sup>

## 3.6 No right of appeal and weak quality control

Despite many years of independent evidence showing alarmingly high levels of errors and inconsistency in decision making, there is no right of appeal or redress for applicants. Many who gave evidence felt the seemingly irrational decisions they experienced were largely due to an absence of sufficient oversight and scrutiny, which has allowed poor quality decision-making to become institutionally acceptable. In practice there appears to be no sanction on an individual, or the system, for inaccurate or inconsistent decisions.

Firstly, internal mechanisms seem weak and superficial<sup>58</sup>. Secondly, there is no external quality control; and thirdly there is no right of appeal for refusal of a visit visa application. The only formal way to overturn a refusal is an expensive and lengthy judicial review, for which most applicants have neither the time nor the resources. Without a mechanism to challenge decisions, the lack of oversight and accountability is aggravated.

Such is the seeming randomness of decision-making that many organisations that sponsor or support large numbers of applications have learnt through experience that it is often more fruitful to simply apply again, paying the fees for a second time, than to try and challenge a decision.

<sup>54</sup> Home Office, Response to ICIBI inspection into Visa Sections in Africa, July 2011 & Home Office, Response to ICIBI Entry Clearance Decision Making: A global review, July 2011

<sup>55</sup> UKVI, 'Visit Visa: Guide to Supporting Documents', 1 September 2016

<sup>56</sup> Hope-Jones, D & Bailey, H, Short minutes of APPG Africa meeting with Rt. Hon. Caroline Nokes MP, 13th February 2019 (See online Appendix)

<sup>57</sup> African Studies Association UK, Written Evidence Submission to APPG, January 2019 (See online Appendix)

<sup>58</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

### 3.7 Under-resourcing of staff

Introducing a robust internal quality checking mechanism was repeatedly recommended as urgent in the ICIBI 2011 global review<sup>59</sup> and was accepted by the Home Office<sup>60</sup>, however, our inquiry submissions and evidence from subsequent ICIBI reports demonstrates that a robust mechanism across UKVI has not been effectively implemented. The 2017 inspection of Croydon DMC found that *“first-line quality assurance of decisions and decision notices needed to improve, especially at Croydon DMC”* and *“that staffing levels across DMCs were consistently too low and that persistent under-resourcing was acute at the ECM grade.”*<sup>61</sup>

Persistent under-resourcing means ECMs are overstretched and unable to provide the individual decision makers (ECOs) with meaningful feedback to learn from their mistakes. ECOs are therefore not held accountable for poor quality decisions. One ECO told inspectors *“I’ve never had any feedback, so I assume that all my decisions are correct”*. The Immigration Minister confirmed that ECOs attend a 8-10 day training course, however whilst there are learning objectives and individual logs, new ECOs do not undergo any formal assessment before taking up their posts.<sup>62</sup> Further agency staff, with less experience and minimal training, are brought in to make up minimum ECO numbers and temporary promotions are made from ECO to ECM grade to ensure minimum levels are met.<sup>63</sup> We judge that under-resourcing of ECMs coupled with high turnover of ECOs was one of the main causes of poor quality decision making.

Further, due to insufficient time for administration allowed to ECOs, the non-retention of documents (copies) on file that were relied upon to make the entry clearance decisions was raised as a concern across inspected DMCs in both 2011 inspections and in 2017. Once again, despite the Home Office accepting previous recommendations to improve this<sup>64</sup>, Croydon DMC was unable to locate 21 of the 160 Croydon files requested for sampling in the 2017 inspection. This further compounds the inability to deliver proper quality assurance.<sup>65</sup>

Although not set at the Ministerial level, the benchmarks for the number of applications an ECO was expected to complete each day further undermines decision making quality. The 2017 ICIBI inspection found benchmarks in place at all DMCs inspected. In Istanbul the daily average was 137 decisions made per ECO – allowing approximately 3 minutes per decision, which even for an experienced decision maker allows little time for careful consideration of the evidence. The inspector shared concerns that similar practices and pressures are in place across all DMCs and is having an impact on the quality of decision making.<sup>66</sup> In a recent letter to the inquiry, the Immigration Minister confirmed that *“ECOs have targets only on general productivity. There are no targets or expectations on the number of refusals any ECO must make”* but did not elaborate on how these daily targets are set or reviewed.<sup>67</sup>

To understand better the ratio of decisions to staff, our inquiry endeavoured to find out the number of full time Entry Clearance Managers and Entry Clearance Officers employed within the UKVI network pertaining to Africa. However, following a written PQ from April 2019, the Home Office declined to provide data on the number of ECOs and ECMs employed in its centres<sup>68</sup>. The fact that the Home Office are deliberately opaque about their capacity to deal with such high volumes, is another cause for concern.

<sup>59</sup> The Independent Chief Inspector for Borders and Immigration, A Comparative Inspection of the UK Borders Agency visas sections that process applications submitted in Africa: Nairobi, Abuja, Pretoria and the UK Visa Section, July 2011 & Independent Chief Inspector for Borders and Immigration, Entry Clearance Decision Making: A Global Review, June 2011

<sup>60</sup> Home Office, Response to ICIBI inspection into Visa Sections in Africa, July 2011 & Home Office, Response to ICIBI Entry Clearance Decision Making: A global review, July 2011

<sup>61</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

<sup>62</sup> The Rt. Hon. Caroline Nokes MP, Minister of State for Immigration, Letter to Chi Onwurah MP 4th June 2019 (See online Appendix)

<sup>63</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

<sup>64</sup> Home Office, Response to ICIBI inspection into Visa Sections in Africa, July 2011 & Home Office, Response to ICIBI Entry Clearance Decision Making: A global review, July 2011

<sup>65</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

<sup>66</sup> The Independent Chief Inspector for Borders and Immigration, An Inspection of Entry Clearance Processing Operations in Croydon and Istanbul, July 2017

<sup>67</sup> The Rt. Hon. Caroline Nokes MP, Letter to Chi Onwurah MP, 4th June 2019 (See online Appendix)

<sup>68</sup> House of Commons, ‘Written Question: Entry Clearances’, 11 April 2019, 244085

We understand that there is a high demand for visas from Africa; we understand that there are resource constraints on Government. But if it is Government policy to have a strict and demanding visa regime, the Government needs to provide the resources necessary to deliver that efficiently if Britain's global reputation is not to suffer.

### **3.8 The role of the Chief Inspector for Borders and Immigration**

It is clear that the only real oversight of the system is the Independent Chief Inspector for Borders and Immigration who on average completes 15 inspections a year, one or two of which might relate specifically to visas. ICIBI inquiries over the past decade have repeatedly raised the alarm over poor-quality decision making and unfairness in the system and called for improved internal quality assurance, procedural fairness and increasing the capacity of first line management. The current ICIBI David Bolt and the former Inspector John Vine both expressed frustration to the APPGs that despite their recommendations for improvement being accepted by the Home Office, things rarely change, even after re-inspections.

The ICIBI's reports and recommendations are addressed to the Home Secretary and laid in Parliament (which is largely seen as administrative). The Home Office provides a response where recommendations are either accepted in whole, accepted partially, or not accepted at all. The report and the Home Office response are published online. However, the ICIBI is not a regulator and has no power to compel the Home Office. David Bolt said on reinspection, issues considered dealt with by the Home Office are often found to persist and the problem is unchanged. Without sustained public and parliamentary interest and oversight, it appears that very little will change or improve.

### **3.9 Response and remedy**

In the past year, a number of academic, arts and business bodies have begun to alert UKVI and British missions overseas to particular events in the UK – conferences, arts festivals etc – for which African academics and artists are being invited. On occasions they have also raised specific cases where a visa has been delayed or refused. In some of these cases, this appears to have helped reduce the number of rejections for example, ASAUK conference in 2018 as compared to the 2016 ASAUK conference. But this is a very labour intensive process for the inviting bodies and for UKVI, and it will be more efficient for all parties to avoid the problem arising in the first place.

<sup>69</sup> ECAS Submission to APPG, June 2019 (See online Appendix)

#### **Case Study: Action to ameliorate unjustified rejection**

Following the successful efforts to reduce the number of rejections at the ASAUK conference in 2018, the organisers of the European Conference on African Studies in Edinburgh in June 2019 not only made a full list of incoming African invitees available to the Home Office, but, with the support of the Royal African Society, made direct contact with senior Home Office officials who were able to overturn 10 of the 18 rejections that had nevertheless been issued. This was immensely helpful, but did require personal intervention at senior level for the problem to be remedied.<sup>69</sup>

Similarly, headline guests for Film Africa's 2016 Gala Opening, Senegalese hip-hop duo Keur Gui had their visas refused but overturned following intervention by the then High Commissioner. Unfortunately, the visa decision was overturned too late for them to make it to London for what would have been their debut UK performance.

An additional example of helpful amelioration by UKVI in its relationship with the Scotland Malawi Partnership is given below in section 4.5.



Gaylene Gould and Blitz the Ambassador. Image by Amifel Cliff-Erifo



Director Rama Thiaw, Film Africa 2016. Image by Ivan Gonzalez

## SECTION 4

# Impact on UK interests

It is undoubtedly true that the UK greatly benefits from its close ties with Africa, a continent of growth and opportunity and very possibly the next century's economic growth powerhouse. By 2030 one in five people will be African<sup>70</sup>.

Across business, trade, healthcare, education and academia, two-way exchange between the UK and Africa is leveraging strong mutual benefit. Britain's diplomatic standing with the countries of Africa is underpinned by generations of civic and associational links, and an active and engaged diaspora population. Behind every nation-to-nation relationship are myriad people-to-people friendships; these are central to the UK's standing in Africa. The benefits of such internationalism resonate through society in many and varied ways but, too often, can be lost from sight or taken for granted.

For each visit, whether of a UK national to Africa or an African to the UK, new opportunities for collaboration are explored and we strengthen our sense of mutual understanding and respect. These are the essential two-way flows which must underpin *Global Britain*.

In this section, we draw out the impact that visa denials for African visitors are having on the UK's own interests. We explore what happens when these essential flows stop, or are significantly impeded. We consider UK interests in the broadest terms to include commercial interests, diplomacy, and academic and cultural reputation. Whilst it is difficult to accurately quantify the damage done to the UK by a visa system that is manifestly unfit for purpose, our report contains concrete examples where harm has been done and costs unnecessarily incurred in both monetary and reputational terms.

### 4.1 Business, trade and investment

The submissions made to us from the commercial and business sectors are vocal and explicit about the harm being done by the current UK visa regime. We heard that the system is harming the private sector's immediate efforts to do business and also threatening its work in the long term. An expensive, time consuming and intrusive application process which does not result in rational decision making is a threat to the UK's long-term commercial interests. The inability to trace the stage which an application had reached caused uncertainty and costly delays to business. Submissions pointed out that the current visa regime hinders the Government's wider efforts to promote the UK as the best place in the world to do business after Brexit.

We did hear of major companies doing multi-million pound contracts with African governments who were able through their direct intervention with Government departments to ensure that all African partners they were inviting to the UK received the desired visas promptly. But this itself indicates that without such direct influence

<sup>70</sup> UNICEF analysis based on United Nations, Department of Economic and Social Affairs, Population Division, World Population Prospects: The 2012 Revision (UN WPP), United Nations, New York, 2013

<sup>71</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

<sup>72</sup> Public Administration International, Written evidence to APPGs, June 2019 (See online Appendix)

there may indeed have been problems, and many smaller businesses wanting to do business with Africa have neither the Government contacts nor the resources to invest in ensuring a smooth visa process for their African partners. The current problems therefore discriminate more heavily against small and medium-sized enterprises trying to expand their business in Africa.

### **Case Studies: Impact on business**

Major UK companies, such as oil companies, tend to have good high-level contacts with British Ministers which helps them ensure their African partners can obtain UK visit visas. But even a large company such as De La Rue reported problems and delays caused by visa refusals. The Regional Director for Africa at De La Rue, informed the APPGs that his company provides around 40 letters of sponsorship for visa applications from Africa each year. Recently, a whole delegation that De La Rue had invited from Somalia had their visas rejected on the grounds that they submitted inadequate information and the assessor did not believe the credentials. On this occasion, the assessor actually phoned from the DMC in South Africa to ask if this application was legitimate, and asked for the letter to be re-worded to say the company will ensure the delegation will return at the end of their visit. But the business opportunity was lost. De La Rue now work with the Department for International Trade (DIT) to submit a letter as part of each UK visa application and coordinate with the local British High Commission or Embassy. But even British Missions often have difficulty getting information on the status of visa applications once submitted.<sup>71</sup>

Public Administration International (PAI) is an independent company based in London that employs seven staff and provides short training courses in a range of aspects of public administration and institutional strengthening to government bodies and departments. It is an accredited short course provider by the British Accreditation Council for Independent Further and Higher Education. Many of their clients are high-level officials from African countries and PAI have been tracking the impact of visa refusals on the attendance at their courses and consequently on their revenue. As a direct consequence of visa refusals and delays, in 2018, PAI reported a total revenue loss of £33,025 and in 2019 (between March–November) a loss of £29,200. Predicted workshop revenue in that period was £56,000, which means that over half of that revenue has been lost due to prospective participants not receiving their visas. PAI have said they have noticed a rapid increase in the number of visa refusal over the past two years and are concerned about the future of their training programme as many of their regular clients have told them they now prefer to travel to the US or even Italy for training courses due solely to the difficulty of obtaining a visit visa for the UK.<sup>72</sup>

Another UK company informed us that it had ceased to invite African partners for meetings in the UK as the risk of refusal or delay was so high. They now travelled to Paris to hold their meetings there – an inconvenience for them, and a loss to the British economy.

Similarly, AFFORD-UK and the Karma Kola foundation have both found that it is risky to organise training and events for African (and diaspora) entrepreneurs in the UK. Since 2015, when a number of African speakers invited to attend an event at Europe House were denied visas, AFFORD has increasingly sought to organise such events in Brussels or elsewhere in the Schengen Zone to reduce risk of visa applications being rejected. Likewise, Karma Cola UK previously invited and supported African entrepreneurs to attend training (organised by DFID), only to find their visa

applications rejected; for this reason they increasingly organise such events in Belgium or the Netherlands.

Further, the Unesco chair in refugee integration, has recently said she will no longer host any international conferences in the UK because of the Home Office's "inept", "embarrassing" and "discriminatory" visitor visa system.<sup>73</sup>

## 4.2 Government Relations

We received evidence of government officials refused visas despite travelling on official business and despite significant interventions by UK-based colleagues in government. Distinguished officials and their personal assistants have been refused visas despite their application being submitted with an official government letter. Submissions pointed out that in this scenario the personal account details of the applicant are irrelevant but have been provided as grounds for refusal.

Even speakers invited to participate in UK Government supported events have encountered significant barriers in applying.

<sup>73</sup> Amelia Hill, Unesco chair blasts "discriminatory" UK visitor visa system, The Guardian, 24th June 2019 ([https://www.theguardian.com/uk-news/2019/jun/24/unesco-chair-blasts-discriminatory-uk-visitor-visa-system?CMP=Share\\_iOSApp\\_Other](https://www.theguardian.com/uk-news/2019/jun/24/unesco-chair-blasts-discriminatory-uk-visitor-visa-system?CMP=Share_iOSApp_Other)- last accessed June 2019)

### Case Study: Impact on British Government work

A women's rights activist from Liberia, working with ActionAid, was personally invited by DFID to speak at the Family Planning Summit in 2017, accompanied by an ActionAid Liberia staff member. This necessitated travel to Accra, Ghana to make the applications, incurring costs and inconvenience. There were significant delays in receiving a decision from the visa issuing centre and, in the event, DFID staff in the UK had to become involved to support the application. Despite this, the visa was not granted in time and she was not able to attend. This barrier to women from the global South participating equally in international events was cited as a significant harm caused.<sup>74</sup>

We heard further evidence of a visit funded through a grant from the Welsh Government as part of its 'Wales for Africa' grant scheme. The applicant had visited Wales several times previously and letters of support were provided by Montgomery Federation of Young Farmers Clubs, Fair Trade Wales and the Welsh Government. The MPs Jo Stevens and Glyn Davies intervened to have the visa refusal overturned but this took place too late for the producer to be able to participate in Fairtrade Fortnight events.<sup>75</sup>

Worryingly, a number of foreign governments made representation during the inquiry, highlighting the impact the UK visa system was having on their governments' work in with the UK. This included oral evidence from the Ghanaian and Ugandan High Commissions, the Embassy of the Islamic Republic of Mauritania<sup>76</sup>, the Tunisian Ambassador and the Malawi High Commission. In each case, these governments spoke of how even government officials were often unable to secure a UK visa when travelling on official business. The case studies in Section 2.1 give further examples of the damage done to governmental relations as a result of UK visa policy.

This all leaves a particularly damaging impression on African partner governments.

<sup>74</sup> ActionAid, Written evidence to APPGs, January 2019 (See online Appendix)

<sup>75</sup> FairTrade Foundation, Letter for Rt. Hon. Caroline Nokes MP, 11th April 2019 (See online Appendix)

<sup>76</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)



Action Aid photo of Sadia Abdi, Country Director of ActionAid Somaliland in London at a march in July 2018.

### 4.3 Incoherence in Cross-Departmental Working

There appears to be a lack of coherent, efficient and effective cross-department working between UKVI and other government departments (OGDs). In its recent report published in January 2019, the Independent Chief Inspector of Borders and Immigration found no evidence of an overarching Home Office Borders, Immigration and Citizenship Service (BICS) strategy for collaborative working with OGDs. The report focused on the UKVI's work with four OGDs: the Department for Work and Pensions; Her Majesty's Revenue and Customs; Department for Education; and Department of Health and Social Care. The report noted that the Home Office 'had no means of assessing, or even articulating, the overall value BICS derived from OGD collaborations.' The ICBI further noted that there was little understanding on the part of the Home Office of what value it could gain from working closely with OGDs.<sup>77</sup>

According to the report, BICS had developed no way of highlighting when an OGD was reliant on the Home Office to deliver its department's objectives. The approach taken has been piecemeal and informal with little ministerial or senior level support for collaboration. Inquiry correspondence with the Foreign Secretary, confirmed that the approach to UKVI-FCO collaboration was piecemeal and unclear, with a lack of ministerial leadership.<sup>78</sup> The ICBI report urged the Home Office to review and enhance the support it provides and our investigation would add that this needs to be ministerially led.

<sup>77</sup> The Independent Chief Inspector for Borders and Immigration, An inspection of Home Office (Borders, Immigration and Citizenship System) collaborative working with other government departments and agencies, January 2019

<sup>78</sup> The Rt. Hon. Jeremy Hunt MP, Secretary of State for Foreign Affairs, Letter to Chi Onwurah MP, 16th April 2019 (online Appendix)

## Case Study: DFID Partners

Search for Common Ground works to build long-term peace in 49 countries and the charity's Annual Common Ground Awards aim to highlight the impact of the UK Department for International Development (DFID) funding for peacebuilding work around the world. In June 2018, Search awarded two individuals from Sierra Leone and the Democratic Republic of Congo for their peacebuilding work. Neither of the Awardees, nor Search staff, (including a Country Director from Sierra Leone) were given visas to come to London to receive their Awards citing a risk they would pose a financial burden to the UK. This is despite showing proof of salary and income and Search being willing sponsors of the visit.<sup>79</sup>

Similarly, BOND reported that in the past two years, of 15 African nationals invited to attend BOND events either as speakers or participants: 5 were successful and 10 were rejected despite support from BOND. Failure to grant visas to African nationals means that their voices are lost from important debates about the future of international development and implementation of the Sustainable Development Goals taking place here in the UK. Ensuring discussion around international development is both inclusive and diverse, something which DFID strongly supports, is made harder by the refusal to grant visitor visas to citizens from other countries, who bring with them a wealth of experience and fresh perspectives in the key issues shaping international development today.<sup>80</sup>

## 4.4 Academic Exchange

The significant harm done to prestigious academic meetings as a result of visa difficulties and denials has received recent press attention (see page 45), illustrated by the case studies below.

Evidence collected by the African Studies Association UK from its biennial conferences in 2016 and 2018 also shows significant damage to prestigious and high-profile academic events in the UK. We have already cited above some of the problems that rejection letters cause, but the questioning of delegates' qualifications or motives for attending a conference or giving a lecture tends to rebound not just on the British Government but on the academic institution hosting the event. In practice these rejections cause reputational harm to British academic institutions, with African colleagues increasingly reluctant to apply to attend events in the UK when faced with apparently irrational decision-making and perceived hostility in the visa system. The UK's reputation as a centre of scholarly excellence is damaged by the reasoning often given for rejection, which too often demonstrates a patronising lack of understanding of the status and achievements of African colleagues.

<sup>79</sup> Search for Common Ground, Written evidence to APPGs, January 2019 (See online Appendix)

<sup>80</sup> BOND, Written evidence to APPGs, January 2019 (See online Appendix)

## Case Studies: Impact on the UK academic sector

The African Studies Association UK has given a detailed account of the scale of the challenge of securing UK visas for African participants in recent academic conferences. By great effort on

the part of the ASUK and RAS the rate of rejections has been reduced; but for one of the largest and most prestigious conferences on African studies in the world, it does damage to both British national and academic reputations that the problem of rejections for *bona fide* invitees persist.

In a case recently reported in the Guardian and Observer newspapers in June 2019, Oxfam highlighted to the inquiry that only one of the 25 individuals from Africa expected to attend a blog-writing training workshop at the LSE's recent Africa Summit, were able to do so because of visa rejections.<sup>81</sup>

Specific examples of the harm done to UK research and leadership in tropical medicine from visa refusals were provided, in addition to those reported last year by the Wellcome Trust.<sup>82</sup>

The 2018 Global Health Conference hosted by the London School of Hygiene & Tropical Medicine (LSHTM) in London in November 2018 aimed to highlight emerging and established women leaders in global health and support the advancement of women in all forms of leadership from local communities to global organisations. It brought together 800 established and emerging leaders with diverse professional and cultural backgrounds including high-level participants from governments, international organisations, business, academia and NGOs. LSHTM reported to us that 19 speakers and delegates from low- and middle-income countries in Africa and Asia were denied visas to enter the United Kingdom for the 2-day conference. The most common reasons for the visa denials included not being able to demonstrate sufficient funds to support their (short) stay in the UK and candidates being deemed as not being able to justify through their personal or professional circumstances that they were visiting the UK as genuine visitors for the conference. The LSHTM were deprived of the opportunity to foster important and impactful academic networks through their conference as a result of these visa denials.<sup>83</sup>

Esther Yei-Mokuwa, a health researcher focusing on Ebola, highlighted the difficulties scientists in Africa are facing to be able to participate in international research on protection from infectious diseases, much of which takes place in the UK. Britain is frustrating this work by not granting visas to scientists, especially those from Africa.<sup>84</sup>

In May 2019, an international team of medical researchers was due to meet in the UK to discuss their data and to plan preparedness for future pandemics. But African researchers involved in two projects on epidemics were denied visas. At the time of writing, every single African citizen who requested a visa as part of this work has been denied, according to the organisers and funders. These applicants paid initial visa fees but then were denied, despite extensive documentation from their institutions.<sup>85</sup>

<sup>81</sup> Harriet Grant, 'Prejudiced' Home Office refusing visas to African researchers, *The Observer*, 8th June 2019, Front Page

<sup>82</sup> Mathew Weaver, UK's science reputation 'at risk if academic visa issue not resolved,' *The Guardian*, 22nd October 2018

<sup>83</sup> LHSTM, Written evidence to APPGs, January 2019 (See online Appendix)

## 4.5 Cultural Exchange

The UK prides itself on being a global centre for the arts and culture, and many people visit the UK to take advantage of the wealth of talent attracted to perform here. This depends, however, on the British cultural organisations being able to bring the best from around the world, including from Africa. The inquiry received evidence from a number of major cultural festivals, including the Edinburgh Festival, that their efforts to do this were explicitly hampered by visa problems encountered by a number of African artists. Again, significant harm was being done to cultural relations

by a lack of understanding of the nuances of cultural exchange. This is encapsulated in the submission of a high-profile dance festival in the UK which was asked why it was seeking to bring an African dancer to the UK and had not found a UK dancer to fill this role (see case study below). As well as the damage to the UK's reputation as a world leading centre for culture and the arts, individual festivals could lose thousands of pounds when this happens.



<sup>84</sup> Ibid

<sup>85</sup> Ibid

<sup>86</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

<sup>87</sup> Sian Cain, Home Office refuses visas for authors invited to Edinburgh Book Festival, *The Guardian*, 8th August 2018

### **Case Study: Impact in the cultural sector**

John Davis and Carolyn Forsyth, Senior Producers at the London International Festival of Theatre (LIFT) gave compelling oral evidence to the inquiry. They highlighted two identical applications they have recently made, for dancers from the Congo that have been touring the world for over fifteen years. One was refused, the other was granted; with no clear sense why this was the case.

They commented that it felt like the visa assessors had not read the application because it quite clearly stated that this production was about these dancers sharing their personal experiences of the civil war, and yet they were asked why they hadn't simply recruited dancers from the UK. A Tier 5 appeal was made but this takes 28 days and you cannot add any new information, it just goes to a new assessor.<sup>86</sup>

The Edinburgh Festival in 2018 made public its concern that a number of invitees to perform or present their books there had been refused visas on grounds that seemed discriminatory.<sup>87</sup>

## 4.6 People-to-people links

One of the traditional strengths of the UK's relations with Africa has been in the many individual links between communities in the UK and on the continent. These often follow personal contacts made during study or travel, and involve many small, local NGOs, charities, voluntary or church groups. Regular personal contact is essential to enable the relationships to remain active and flourish. We received evidence that, while it was usually no problem for British citizens to visit their African counterparts, it is increasingly difficult for Africans to make the return visits to the UK, even when supported by local British communities or organisations, or even funded by HMG.

Many people-to-people and community-to-community links exist on a purely goodwill basis, underpinned by mutual trust and understanding, and long term friendships. They are often framed around a shared goal of reducing poverty, and mitigating the worst effects of poverty, through two-way dignified partnerships. In the vast majority of cases, visits from the African partner to the UK are fully funded by the UK partner. Into this context, the requirement for all those travelling from Africa to provide three months worth of bank statements, wage slips and letters from employers is especially toxic.

As many churches, schools, charities, diaspora associations and other community groups have told the inquiry, their partners are suffering extreme poverty and this, to a large extent, is why the partnership exists. The blurring of poverty with presumed criminality is deeply harmful to these relationships and the spirit of dignified partnership they rely on.

Rejecting an African priest or primary school teacher for not having enough funds in their bank account not to abscond leads to a feeling of imbalance and discrimination in the relationship, it makes links harder to sustain, and it damages the UK's reputation for fair play and giving a warm welcome to foreign citizens.



Scotland Malawi Partnership. Image of Vera Kamtukule, Chief Executive of the Malawi Scotland Partnership visiting Scotland for the first time in 2017.

## **Case Study: Practical impact on community contacts: the Scotland Malawi Partnership**

Representing 1,200 different civic links between Scotland and Malawi, engaging 109,000 Scots annually, the Scotland Malawi Partnership (SMP) gave written and oral evidence highlighting the serious negative impact of UK visa processing policy. Such civic links, whether through churches, schools, NGOs, businesses, universities, colleges, hospitals or health clinics, are people-to-people partnerships, underpinned by a spirit of mutual trust and understanding. They are undermined when individuals, invited to the UK by their Scottish partners, are treated in an inhumane manner by a system which pays scant regard for customer experience or even, seemingly, the quality of decision-making.<sup>88</sup>

Asking for three months of bank statements is the single most damaging element of the process. These are links which aim to fight extreme poverty through friendship and human solidarity. Asking the partners to prove their affluence conflates poverty with presumed criminality. This is both morally and conceptually flawed. There is no evidence to suggest that the poorer an individual, the more likely he or she will abscond. It does tremendous damage to civic links but adds little or nothing to the quality of decision-making.

While the SMP believes the policy and principle underpinning UK visa issuing is fundamentally flawed, and does tremendous damage to civic links, it recognises that good systems have been established by UKVI for the SMP to be able to support individual applications directly at the VAC and visa processing hub. UKVI has invested in the relationship with the SMP and takes seriously applications supported by the SMP. This helps both the SMP and UKVI, as it helps UKVI identify low-risk applications, saving them time and capacity.

While such systems are only available for a relatively small number of applicants (members of the SMP who seek assistance from the outset), it does present a compelling model for UKVI to follow elsewhere. Investing time in stakeholder engagement, understanding the key networks in the UK, and establishing direct communication channels of trust and mutual understanding, ultimately increases the quality of decision-making and decreases the time required to assess low-risk applications.

<sup>88</sup> Scotland Malawi Partnership, Written evidence to APPGs, January 2019 (See online Appendix)

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Many of those who gave evidence felt UKVI's systems in Africa did not aspire to make the best possible decisions but rather looked to place ever more barriers and impediments in the way of applicants, in order to deliberately decrease the number of applications received as more and more people are put off visiting the UK.

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## SECTION 5

# Conclusions & Recommendations

### 5.1 Conclusions

Over a period of seven months, this joint APPG inquiry has collected evidence from a diverse range of key stakeholders who have experience engaging the UK's visa systems for those applying from Africa. The majority of those who gave evidence were credible and respected UK-based organisations and individuals, who regularly invite partners in Africa to the UK as part of longstanding and valuable work across business, trade, charity, culture and the arts. We have also received extensive, powerful personal testimony from individuals from diaspora communities and representatives of African governments, based in the UK.

The public hearing in January was over-subscribed, with every seat occupied by a different individual keen to share their own experience of engaging the UK visa system. So strong was the desire from the audience to share their personal stories, that MPs and Peers co-chairing these sessions had to change the agreed format to give time for as many as possible in the audience to share their experience. This is captured in the minutes of this meeting.<sup>89</sup>

There was a striking similarity of views between the diverse range of organisations and individuals represented. Almost everyone spoke, in one way or another, of what appeared to be a dysfunctional UKVI system, divorced from the realities of Africa; they spoke of the frustration they and their partners in Africa felt as they navigated the system; they highlighted the unreasonable evidential requirements and the frequency of simple and avoidable errors; and they highlighted the lasting negative impact the experience of applying for a visa was having.

While encapsulating and verifying the frustration that emerged through the inquiry, the report also puts forward tangible and achievable recommendations which we feel could help UKVI respond to these concerns.

The inquiry finds that the logistical burdens and inconvenience imposed on visa applicants, together with the erratic nature of decision making and the reasons given for rejection of visa applications, does significant damage to the UK's own interests. It hinders business partnerships, cultural and personal exchanges, damages inter-governmental relations and even undermines efforts to showcase the impact of UK Aid and of international peacebuilding work funded by the UK. It is undermining the work of the Department for International Trade, the Foreign and Commonwealth Office and the Department for International Development, as well as what thousands of UK civic groups are doing.

<sup>89</sup> Minute of oral evidence hearing, 22nd January 2019 (See online Appendix)

The UK cannot be an outward-looking nation, it cannot be 'open for business' without improving the systems that allow access to people.

The contrast between the reality of how those from Africa are treated as they navigate the UK visa system and the UK Government's narrative of a post-Brexit 'Global Britain' is sobering. Global Britain cannot and will not be a reality until the current problems can be resolved.

We recognise the need for effective visa systems to ensure managed migration and to keep specific individuals out of the UK. This requires quality decision-making. However, at present, evidence suggests systems are not designed to find the best balance between quality of decision-making, cost effectiveness and customer experience. The inquiry has seen repeated examples where the reality on the ground is a system which fails on all three of these measures.

UKVI seems to lack any meaningful customer feedback systems. This, combined with the absence of a right of appeal for visitor visas, means there is worryingly little learning and development, and very limited accountability. Reference is frequently made, both in the discussions the inquiry had with senior officials and in previous Parliamentary debates, of the UK having a world-leading visa system and that strategic shifts such as network consolidation are enhancing the user experience, but there is little or no evidence in our inquiry to back-up such assertions.

Many of the findings of this inquiry have already been highlighted over a number of years by the Independent Chief Inspector. While in many cases their recommendations have been accepted by HMG, there is very limited evidence that this has led to any significant improvement in the customer experience for African applicants, which continues to be costly, erratic and unsatisfactory.

We fear many of the most damaging elements of the visa processing system highlighted in this report add little or nothing to the quality of the decision-making: many feel they at best show contempt for applicants and at worse expose real prejudice. Without compelling evidence, for example, that the poorer an applicant is the more likely they will abscond, asking for bank statements and evidence of affluence will not reduce overstays. Similarly, the decision to courier all personal documentation across the continent just to be scanned in by the same private company that sends them, with HMG never actually seeing the physical documents, adds nothing to decision-making, increases costs, slows the process and makes the system in every way worse for the applicant.

Many of those who gave evidence felt UKVI's systems in Africa did not aspire to make the best possible decisions but rather looked to place ever more barriers and impediments in the way of applicants, in order to deliberately decrease the number of applications received as more and more people are put off visiting the UK.

Without effective feedback systems to understand the damage being done to UK Plc, this crude policy which deters *all* from applying, and which is broadly akin to the 'hostile environment' established in the UK, might be seen to be working. The more damage that is done to the UK's reputation, the fewer people wish to visit, the fewer visa applications are received, and the more manageable, this process seems. It is

the job of parliament to listen to, and represent, those who are seeing the damage done to Global Britain, and ensure that HMG moves to a more intelligent, evidence-driven and human-centred system.

In part, as a number of contributors identified, the issue is that the current visa system was never designed to function as it does. It has been added to and amended, too often for political rather than practical reasons, and the result is a system which satisfies no one. It does not afford quality decision-making, there is no evidence that it is cost effective, and it is doing tremendous damage to the image and interests of Global Britain.

One powerful contribution in the evidence session highlighted the fundamental lack of dignity, respect, parity and self-awareness in the processes, asking whether anyone in the UK would accept an invitation to a country in Africa if they had to first travel across the UK in person to submit biometric data and give to a private company their passport, birth certificate and marriage certificate, and those of their immediate family members, three months of bank statements, wage slips and a letter from their employer. For these items to be posted across the continent to the same private company in a third country thousands of miles away, just to be scanned in and held until completion; to pay the equivalent of 2-3 months of the average national wage, for someone to spend just three minutes assessing the application with inevitable errors and inconsistencies, but with no recourse to appeal or refund. If we would not entertain the idea of ourselves navigating such a system, we cannot expect this system to succeed in supporting our shared vision for an outward-looking, Global Britain.

Public outcry against the handling of the Windrush scandal in 2018 seems to mark the beginning of a shift in public attitudes towards migration. There is still, for many, a serious concern about the levels of net immigration into the UK. But, for most, there is an increased awareness of the different forms of migration and the need for a human-centred approach. The 'hostile environment' policy, which looked to make life as difficult as possible for, seemingly, as many as possible, has now been discredited. It is essential that the same toxic assumptions and apparent prejudices are also taken out of the visa application system.

There is increasing public interest<sup>90</sup> in this area post-Windrush, with the Observer newspaper giving frontpage coverage to the early stages of this inquiry<sup>91</sup>. We expect public, media and parliamentary interest in this topic to continue in the coming months and years, and hence we are keen to encourage and support tangible steps that can be taken to improve the situation.

## 5.2 Recommendations

<sup>90</sup> Online Appendix - <http://bit.ly/APPGvisas>

<sup>91</sup> Harriet Grant, 'Prejudiced' Home Office refusing visas to African researchers, The Observer, 8th June 2019, Front Page

<sup>92</sup> Annex 3- Recommendations Tabular Form (See online Appendix)

Annex 3<sup>92</sup> to this report gives shorter-term/lower-cost and longer-term/potentially higher cost recommendations for each of the six main issues identified in this report. We encourage UKVI to seriously reflect on all of these issues, and each of the eight recommendations made, sharing publicly with this inquiry its assessment of what steps can be taken, and when.

For brevity, we highlight below the seven most significant recommendations we wish

to make, indicating the relative cost of the measures.

**To improve the application process:**

1. Introduce an expedited application process for those applicants who currently have to travel to a neighbouring country to apply and/or be interviewed for a visa, recognising the increased difficulties they face because of the lack of a VAC in the country of application (low cost).
2. Provide clearer and more detailed information to applicants on visa application processes and requirements, especially in terms of supporting documents that must be submitted by the applicant. Greater efforts should be made to make clear the timescales required, such that applicants know if they are submitting an application which is unlikely to be processed before the date of travel (low cost).
3. Where decision-making is fully digitized, ensure documents are scanned in the country of application, allowing applicants to keep their documents if they wish (medium cost).
4. Increase the number of countries with VACs, or else look to use local FCO facilities, or establish partnership arrangements with other countries to share facilities (higher cost).

**To improve decision-making:**

5. Strengthen quality control systems for rejection letters before they issue, in particular to ensure the supporting evidence has been fully taken into account, and that Visit Visa Guidance is changed to prevent prejudicial/biased assumptions being taken into account in reasons for refusal letters.
6. Where there is clear and compelling evidence that a visit is fully-funded by a credible UK-based sponsor, either remove the requirement for the applicant to submit bank statements and prove affluence, or else publish the evidence-base establishing the causal link between poverty and visa overstays.
7. Support greater input from High Commissions and Embassies into the decision-making processes as a matter of course. Streamlined processes should be explored to speed up and simplify the process for VIPs (low cost).
8. Reinforce the role of the Inspectorate and monitor the implementation of the Inspector's recommendations, together with a more systematic relationship between the Chief Inspector and the relevant Parliamentary Select Committee (medium cost).

The APPGs look forward to meeting again with the Minister of State for Immigration to discuss the findings of this report, reflect on the recommendations, and explore what cross-party support can be given to assist the implementation of these recommendations.

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30th July 2017

## UK's 'secret travel ban' preventing world's best and brightest from entering Scotland

Exclusive by Karin Goodwin



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## Edinburgh book festival fears losing star authors to overseas rivals over visa hassles

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## The Observer Home Office

Harriet Grant  
Sat 8 Jun 2019 21:07 BST

## 'Prejudiced' Home Office refusing visas to African researchers

Academics invited to the UK are refused entry 'insulting grounds'



worker in protective clothing leaves the dressing room at a laboratory in the Republic of the Congo. Photograph: Baz Ratner/Reuters

## Unesco chair blasts 'discriminatory' UK visitor visa system

Alison Phipps accuses Home Office of 'secret travel ban' against visiting academics



## African acts pull out of Celtic Connections over visa 'hassle and stress'

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More from Lifestyle

## Dundee MP accuses Home Office of persecuting academics in visa row

by Stefan Morkis June 9 2019, 7:47am



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## Edinburgh arts festivals lobby for urgent visa reforms

Umbrella body meets minister to discuss concerns over limits on artists entering UK



Severin Carrell Scotland editor  
Thu 6 Jun 2019 18:30 BST

## Womad festival struggling to book artists due to Brexit uncertainty

World music festival director says acts worry they will face visa problems this summer



## UK minister pledges to look for solution on Edinburgh festival visas

Deirdre Brock says political will is needed to find a solution



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For a list of articles, please see: <http://bit.ly/APPGvisas>



Royal African Society

### **The Royal African Society (RAS)**

The Royal African Society is a membership organisation that provides opportunities for people to connect, celebrate and engage critically with a wide range of topics and ideas about Africa today. Through our events, publications and digital channels we share insight, instigate debate and facilitate mutual understanding between the UK and Africa. We amplify African voices and interests in academia, business, politics, the arts and education, reaching a network of more than one million people globally.

[www.royalafricansociety.org](http://www.royalafricansociety.org) | @RoyAfriSoc



### **The African Studies Association UK (ASAUK)**

The African Studies Association of the United Kingdom was founded in 1963 and is the national subject association for Africanists within the academic community. The objects of ASAUK as defined in its statutes are to advance African Studies, particularly in the United Kingdom, by providing facilities for the interchange of information and ideas and the co-ordination of activities.

[www.asauk.net](http://www.asauk.net) | @ASAUK\_News



### **African Foundation for Development (AFFORD)**

AFFORD was established in 1994, with a mission “to expand and enhance the contributions Africans in the diaspora make to African development”. Priority projects and activities are focused on diaspora contributions to job creation through African enterprise development. AFFORD’s mission is achieved through programmes and projects undertaken solely or in collaboration with partners in Africa, the U.K, E.U and other parts of the world.

[www.afford-uk.org](http://www.afford-uk.org) | @AFFORD\_UK



### **The Scotland Malawi Partnership (SMP)**

The Scotland Malawi Partnership is the national civil society network coordinating, representing and supporting 1,200 people-to-people links between our two nations. It represents a community of 109,000 people in Scotland with active links to Malawi, as part of a shared history that dates back 160 years to the travels of Dr David Livingstone. An estimated 45% of Scots can today name a friend or family member with a connection to Malawi. This approach is based not on ‘donors’ and ‘recipients’ but on long-standing, mutually-beneficial community-to-community, family-to-family and people-to-people links, each on its own quite modest in scale but, together, a formidable force for progressive change. The SMP is a charity independent of government but kindly core funded by successive Scottish Governments. Scotland’s friendship with Malawi enjoys all-party political support from all 59 Scottish MPs and all 129 MSPs, as well as the governments of Scotland, the UK and Malawi. The SMP provides the secretariat for the Malawi All-Party Parliamentary Group in Westminster and the Malawi Cross Party Group in Holyrood.

[www.scotland-malawipartnership.org](http://www.scotland-malawipartnership.org) | @ScotlandMalawi



### **All Party Parliamentary Group Africa**

The Africa APPG exists to facilitate mutually beneficial relationships between Africa and the UK and works to further understanding within UK parliament of contemporary African and Pan-African matters. The APPG creates space for parliamentarians to engage in dialogue with African diaspora, civil society, institutions, thought leaders and private sector to promote African led-development agendas and challenge negative stereotypes through positive relationships between the UK and African countries. And with a membership of over 200 parliamentarians from across-parties and houses, it is one of the largest and most active APPGs in UK parliament. The group is chaired by Chi Onwurah MP & Lord David Chidgey.

[www.royalafricansociety.org/appg-africa](http://www.royalafricansociety.org/appg-africa) | @AfricaAPPG



### **All Party Parliamentary Group for Diaspora, Development & Migration**

The APPG on Diaspora, Development, and Migration (DDM) aims to promote parliamentary and public understanding of the key issues affecting diaspora communities in the UK, and to expand and enhance their contributions to the international development agenda. APPG DDM works to connect parliamentarians with diaspora organisations, academics and civil society groups to inform policy on how diaspora contributions can be harnessed for a greater impact, especially at a time when migration issues are surrounded by negative rhetoric.

[www.afford-uk.org/what-we-do/projects/appg-ddm/](http://www.afford-uk.org/what-we-do/projects/appg-ddm/)



### **Malawi All Party Parliamentary Group**

The Malawi APPG exists to promote understanding and awareness among parliamentarians, positive relations between our countries, and provide a forum for discussion on relevant issues affecting politics, society, culture and the economy in Malawi. It brings together MPs and Peers from across the UK with a particular interest in UK-Malawi relations.

[www.scotland-malawipartnership.org/get-involved/malawi-appg/](http://www.scotland-malawipartnership.org/get-involved/malawi-appg/)

